

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM and AMAZON DATA
SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS, et al.

Defendants.

Case No. 1:20-CV-484-RDA-IDD

NOTICE OF CORRECTION

PLEASE TAKE NOTICE that the undersigned is filing herewith a second copy of the Declaration of Jeffrey R. Hamlin in Support of Defendants' Reply in Support of Joint Motion to Dismiss Under 28 U.S.C. § 1367(c) ("Hamlin Declaration"), which Declaration is identical to the version uploaded to the docket earlier this evening as ECF No. 1416-1. I am refiling the Hamlin Declaration solely to fix the document that was attached to it as Exhibit A.

Notably, the corrected Exhibit A is timely as it is being filed within the Defendants' original deadline for replying to Amazon's response to Defendants' Joint Motion to Dismiss Under 28 U.S.C. § 1367(c) (ECF No. 1410).

The version of Exhibit A that the undersigned uploaded to the docket earlier this evening as ECF No. 1416-2 consists of forty-four (44) pages. Minutes after filing, the undersigned was informed that the incorrect version had been uploaded. In fact, the version of Exhibit A that Defendants intended to file is attached to the Hamlin Declaration attached hereto and consists of

twenty-eight (28) pages. All twenty-eight pages in the corrected version are common to both versions and identical in every respect with the possible exception of the ECF No. stamped onto them. The sole difference between the initial and corrected Exhibit A is that the initial version included sixteen pages that Defendants ultimately cut from the exhibit.

Having filed this Notice on the evening of June 26, 2023, the undersigned will contact the Civil Clerk on the morning of Tuesday, June 27, 2023, to confirm the Court is aware that ECF No. 1417-1 and 1417-2 are intended to supersede the analogous documents filed at ECF Nos. 1416-1 and 1416-2 on the date shown below.

Executed on June 26, 2023.

Respectfully submitted,

/s/ Jeffrey R. Hamlin
Jeffrey R. Hamlin (VSB 46932)
IFRAH PLLC
1717 Pennsylvania Ave. NW, Suite 650
Washington, DC 20006
(202) 524-4140 – Tel.
(202) 524-4143 – Fax
jhamlin@ifrahlaw.com

Counsel for the Watson Defendants